

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-23-0413

ABIGAIL JO SHRY

UNOPPOSED MOTION FOR CONTINUANCE OF SENTENCING

The Defendant, Abigail Jo Shry, moves this Court for a thirty-day continuance of the January 31, 2025, sentencing date, and all other deadlines in support of this motion presents the following:

Ms. Shry is charged with threat by interstate communication in violation of 18 U.S.C. § 875(c). The Pre-sentence Investigation Report (“PSR”) in this case was disclosed to counsel on December 18, 2024. Objections to the report were due on January 3, 2025, and sentencing is set for January 31, 2025.

Additional time is needed to collect and present mitigation on behalf of Ms. Shry. Undersigned counsel requests that a continuance be granted and sentencing, and all other deadlines be re-set by 30 days.

The government does not oppose this Motion for Continuance.

Respectfully submitted,

PHILIP G. GALLAGHER
Interim Federal Public Defender
Southern District of Texas No. 566458
New Jersey State Bar No. 2320341

Amr A. Ahmed
AMR A. AHMED
Assistant Federal Public Defender
Southern District of Texas No. 3088803
Virginia State Bar No. 81787
440 Louisiana, Suite 1350
Houston, TX 77002-1056
Telephone: 713.718.4600
Fax: 713.718.4610

CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Richard Hanes and determined that the United States is unopposed to this motion for continuance.

By /s/ Amr A. Ahmed
AMR A. AHMED

CERTIFICATE OF SERVICE

I certify that on January 8, 2025, a copy of the foregoing Unopposed Motion to Continue Sentencing was served by Notification of Electronic Filing and by electronic mail to the office of Assistant United States Attorney Richard Hanes and United States Probation Officer Brittney Felder.

By /s/ Amr A. Ahmed
AMR A. AHMED